

Correspondence



RABBIT CREEK COMMUNITY COUNCIL (RCCC) A Forum for Respectful Communication & Community Relations



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Alaska Department of Transportation & Public Facilities
Central Region Preliminary Design & Environmental
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February 24, 2023

Re: Comments on the ADOT Notice of Intent to begin engineering and environmental studies and floodplain encroachment, **Seward Highway Mile Post 98.5 to 118, Bird Flats to Rabbit Creek**

Dear Mr. Elliott:

At our February 9, 2023, meeting, Rabbit Creek Community Council (RCCC) discussed concerns relevant to the Engineering and Environmental Studies phase of the Seward Highway, Mile Post 98.5 to 118 project. The Council voted to compile and send specific concerns, as detailed below, with 17 yeas, 0 nays and 1 abstention:

General comments:

1. RCCC requests that Alaska Department of Transportation & Public Facilities (DOT) apply a scoping process for the Environmental Assessment under provisions of 43 CFR § 46.305. Scoping is well justified for this project given the complex and dynamic nature of the shoreline and adjoining uplands in the Seward Highway corridor along Turnagain Arm, and the multiple uses occurring along this corridor (e.g., as transit to Girdwood and the Kenai Peninsula by residents and visitors who are a key economic engine for Anchorage and the state, cyclists, hikers accessing numerous trails along the corridor, kite surfers, fishers, etc.). A scoping process will ensure that the full breadth of environmental issues is identified and investigated. In addition, scoping of all travel modes will ensure that multiple travel modes are integrated into this corridor by careful design, and not just as accessories to the highway. And finally, scoping will allow parks and recreation advocates to be engaged. They are ones who can best identify impacts and mitigation options, as well as opportunities to enhance visitor uses.
2. RCCC requests DOT to (1) provide multiple public meetings, including presentations to Community Councils and interested groups, including parks and recreation advocates (e.g., Chugach State Park Advisory Board, Bike Anchorage, etc.), (2) then publish a draft Environmental Assessment for public and agency comments under provisions of 43 CFR § 46.305, and (3) give due consideration to those comments. The critical connectivity of

this highway, as well as the vulnerability of the natural environment and diverse users, merit public review and feedback at the draft stage of the Environmental Assessment.

3. Consider a wide range of options to promote safety and minimize the impact of the road corridor on habitat and scenic values, including moving portions of the highway outside of the railroad at Potter Marsh; and tunneling. Straighter and faster is not always safer.
4. More lanes invite more traffic. Road-expansion has proven ineffective at solving congestion. (See Transportation 4 America, *The Congestion Con*). The design of the roadway should be for safety and mitigation of environmental impacts. The capacity of the road should be based on national and municipal goals of decreased auto dependency and an increase in alternative travel modes.

Background

The Seward Highway is the main transportation artery between Anchorage and the Kenai Peninsula. Rabbit Creek Community Council adjoins the Seward Highway along Potter Marsh. DOT recorded Annual Average Daily Traffic of 10,300 at Potter Marsh, and our own observations suggest that on peak days the vehicle count is twice that average.

The Seward Highway provides the primary access to Potter Marsh and the Turnagain Arm Unit of Chugach State Park, giving travelers access to wildlife enjoyment, scenery and recreation. As noted above, it is also the access route to Girdwood, Whittier and Prince William Sound, and communities on the Kenai Peninsula. The Highway is an All-American Road under the National Scenic Byway program. The dominant travel mode in this corridor is currently private vehicle travel, with recreational vehicles and buses commonly crowding this corridor during the summer. The proposed reconstruction should deliver safe and convenient travel options by diverse modes. This should include non-motorized facilities, especially a separated bike path; railway upgrades for passenger and freight transport; and commuter options that can reduce dependence on driving and reduce vehicle miles traveled (VMT) and carbon emissions. Climate change mitigation is a pressing responsibility for all of us. The Municipality estimates that 53 percent of local Greenhouse Gas Emissions (GGE) come from transportation. This Environmental Assessment should calculate the annual GGE from various alternatives within this travel corridor. The Environmental Assessment should show how a combination of rail, transit, shared rides, and non-motorized travel can reduce vehicle miles traveled, and thus reduce GGE and other environmental impacts.

Detailed concerns relative to specific segments of the project

Potter Marsh area

- We suggest that a specific goal, as follows in bold, be added to the Notice of Intent:
“The purpose of the project is to implement safety upgrades to decrease high-severity crashes and improve traffic operations to alleviate traffic congestion, **while protecting Potter Marsh’s wildlife, habitats, and waters.**”

Potter Marsh, within the Anchorage Coastal Wildlife Refuge, has been administered by the Alaska Department of Fish and Game (ADF&G) for over 50 years to protect its habitats, wildlife, and their public enjoyment. At least 130 species of birds visit or nest there. Over 100,000 residents and visitors frequent Potter Marsh each year

to watch and photograph trumpeter swans, Arctic terns, cranes, and other water birds; salmon, moose, beavers, coyotes, and other wildlife live and migrate through here. Other users enjoy ice skating, walking, and x-country skiing at this popular destination.

- Design for safe visitor access and undisturbed views of Potter Marsh:
 - Protect the viewsheds from the Highway as well as from the neighborhoods down onto the marsh. Do not erect intrusive fencing.

Do not install large marquees (such as the current marquee at Potter Valley Drive intersection) where they will intrude into views of the marsh, the tidelands, or the mountains.

- Coordinate with ADF&G to replace failing and undersized culverts for Rabbit Creek to ensure fish passage and wildlife passage.
- Work closely with ADF&G to reduce traffic impacts on wildlife and wetlands habitat:
 - Minimize light pollution. Use lighting modes that will not affect nighttime bird activity and disturb neighborhoods (which is the case with some of the current railroad lighting at Potter Station).
 - Mitigate the impacts of traffic noise along the marsh and for neighborhoods near the highway. For example, use quiet versions of rumble strips near these areas.
 - Eliminate the need for train horns at Potter Station and at the shooting range.
 - Use some of the mitigation money from wetlands filled in this project to enhance the wetland habitat values of Potter Marsh. Develop marsh enhancements that increase open water, mitigate impacts of runoff and increase productivity of bird habitat. Potter Marsh resulted from human development of the railroad and highway, so modifications to improve ecological function make sense.
- Upgrade the intersection with Potter Valley Road with a minimal footprint on the Marsh and without destroying the dramatic bluffs.
- Designate Old Seward Highway east of Potter Marsh as a low-speed recreation corridor and scenic byway, not a frontage road. This stretch of road has spawning and nesting areas and an unusual andesitic dike. Adjoining uplands are under consideration for conservation status. Involve the community and ADF&G in re-designing this stretch of the Old Seward Highway for self-enforced low vehicle speeds and for active transportation, to provide maximum wildlife habitat and safe recreation for the many cyclists, walkers, photographers, roller skiers and others who treasure this corridor.
- Create an off-the-roadway trail connecting the South Potter Marsh Visitor Pullout at Potter Valley Road (construction date of 2023) to Turnagain Arm Trail. This will help meet the high demand for trailhead parking without a need for pedestrians to cross the highway, as they do when parking at the Potter Station pullout west of the Highway.
- Provide safe access to the pullout of the historic Potter Station House.
- Include a trail connection from the North Potter Marsh Pullout to the proposed pathway to Ocean View Park, as proposed by the Anchorage Park Foundation.

Seward Highway from Bird Flats to Potter

- Promote safety through design, to minimize dangerous driving and self-enforce speed limits. Excessive speed kills. Do not create the same type of straight-aways as on other parts of the Seward Highway (such as between Turnagain Arm and Turnagain Pass) where cars speed at 80 mph and higher.
- Work with the Alaska Railroad Corporation to determine controlled crossing points of the railroad to the coastal flats at a few locations for emergencies or controlled public access to views and recreation. Sailboarding and kiteboarding are among the safe uses of the near-shore area, but need designated points for safe access. A ditch or other safety barrier along the railroad should be designed not to obstruct or degrade the scenic coastal views that merit Nation Scenic Byway status.
- Design for multi-modal transportation, including potential commuter rail to Girdwood
 - Provide a fully-separated non-motorized pathway with views of Turnagain Arm and maximal screening from highway traffic. Non-motorized transportation should be safe, convenient, and appealing.
 - Ensure that the historic Turnagain Arm Trail remains a continuous woodland trail along the hillside: do not relocate it to the highway's edge. The hillside trail is likely to be designated as a segment of the Alaska Long Trail.
 - The Bird and Indian communities, including the campground, fishing areas, and trailheads, need safe, appealing non-motorized connections that obviate the need to drive to community destinations.
 - Consider how to accommodate large truck traffic without jeopardizing small vehicle safety.
 - Work with Alaska Railroad Corporation to ensure that the alignment of the railroad is well-suited for both freight and passenger rail, including future commuter rail at speeds that will make the train a convenient option to driving.
- Maintain the character of Chugach State Park. Alaska Statutes prohibit the use of the Park as a quarry for fill for non-Park projects. Quarried cliffs such as the one near Bird Creek are impossible to revegetate and are a disruption to the natural scenic setting of the Park.
- Provide for safe access to Chugach State Park at current and additional pullouts and trailheads.
- Identify the most valuable wetlands for wildlife, and minimize the impact on those wetlands.
- Minimize the impact to endangered beluga whales, via a formal Consultation with the National Marine Fisheries Service (NMFS), which is responsible for this species. Preserve remnants of existing shoreline which create critical eddies for belugas.
- Preserve the historic Potter Station house and the remnant beach.
- Take all aspects of climate change into account, in consultation with ADF&G and NOAA, considering:

- How can this corridor be constructed to be resilient to rising ocean levels, extreme temperatures, and greater precipitation events—what alignments, what materials?
- What combination of infrastructure will provide efficient, equitable alternatives to solo driving, and avoid induced traffic demand?
- How can construction use energy-efficient, durable materials and techniques to minimize future maintenance and repair?
- How can this corridor retain habitat to support resident and migratory species that are stressed by climate change?

Thank you for your attention to these comments. Please note, RCCC has already provided extensive comments on the previous Seward Highway MP 105-107 Windy Corner Project, and then the expanded project to Rainbow to encompass MP 105-109.5. Those comments remain applicable and are complimentary to the comments included in this letter. We would be happy to meet with you to discuss how we can most effectively work to ensure our concerns and recommendations can be incorporated into this project.

Sincerely,



Ann Rappoport, Co-chair



John Riley, Co-Chair

cc: Tom Schmid, Project Manager, ADOT
Ben Corwin, Chugach State Park Superintendent
Chugach State Park Citizens Advisory Board
Emily Weiser, President, BikeAnchorage